

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**YVETTE CYPRESS,**

**Plaintiff,**

**v.**

**PORTFOLIO RECOVERY  
ASSOCIATES, LLC,**

**Defendant.**

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**CASE NO. 2:21-cv-198**

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that on this date, Defendant Portfolio Recovery Associates, LLC hereby removes the above-captioned matter to this Court from the Court of Common Pleas of Allegheny County, Pennsylvania and in support thereof avers as follows:

1. Portfolio Recovery Associates, LLC is a defendant in a civil action originally filed on October 30, 2020 in the Court of Common Pleas of Allegheny County, Pennsylvania titled *Yvette Cypress v. Portfolio Recovery Associates, LLC* and docketed to Case No.: AR-20-004181.

2. This removal is timely under 28 U.S.C. § 1446(b). PRA received service of Plaintiff's Complaint via certified mail on January 12, 2021.

3. Pursuant to 28 U.S.C. § 1446, attached hereto as Exhibits A and B are copies of all pleadings, process and orders filed in the state court action.

4. The District Court<sup>1</sup> has original jurisdiction over this action pursuant to 28 U.S.C. § 1331, in that Plaintiff has filed claims against PRA alleging violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*

5. On this date, PRA has provided notice of this Removal to counsel for Plaintiff and to the Court of Common Pleas of Allegheny County, Pennsylvania.

WHEREFORE, Defendant Portfolio Recovery Associates, LLC respectfully removes this case to the United States District for the Western District of Pennsylvania.

Respectfully submitted,

**MESSER STRICKLER, LTD.**

By: /s/ Lauren M. Burnette  
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*Counsel for Defendant*

Dated: February 11, 2021

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<sup>1</sup> Although Plaintiff filed this lawsuit in Allegheny County, thus requiring PRA to remove the case to this Court, Plaintiff's Complaint contains no facts to establish the propriety of venue in Allegheny County. PRA has filed Preliminary Objections as to venue. *See* Exhibit B.

**CERTIFICATE OF SERVICE**

I certify that on February 11, 2021, a true copy of the foregoing document was served as follows:

*Via Email and U.S. Mail, Postage Prepaid*

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*Counsel for Plaintiff*

*Via Electronic Filing*

Court of Common Pleas  
Allegheny County  
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**MESSER STRICKLER, LTD.**

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Dated: February 11, 2021